

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

**TRUSTEES OF THE PLUMBERS AND  
PIPEFITTERS NATIONAL PENSION FUND,**

**Plaintiffs,**

**v.**

**PAUL S. YONEY, INC. a/k/a YONEY  
INCORPORATED, et al.,**

**Defendants.**

**Civil Action No. 1:96-cv-02427**

**MOTION TO WITHDRAW APPEARANCE ON BEHALF OF DEFENDANTS**

Now comes Brian Steinbach, Esq., and Epstein Becker & Green, P.C. ("current counsel") and move to withdraw their appearance in this case on behalf of Defendants Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al. In support thereof, current counsel state as follows:

1. On April 14, 2003, current counsel entered an appearance in this matter on behalf of Defendants Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al.
2. Current counsel have been unable to reach a resolution with Defendants concerning the terms of their continued representation of Defendants.
3. There are no pending deadlines in this case and therefore withdrawal of current counsel will not significantly delay or otherwise affect the processing of this case.
4. Current counsel has notified Defendants of their proposed withdrawal and that they must have new counsel enter an appearance or be subject to a default judgment on claims against it. The certification required by L. Rule 101(2)(b) is attached as Exhibit A.

WHEREFORE, current counsel, Brian Steinbach, Esq. and Epstein Becker & Green, P.C., respectfully request that their motion to withdraw their appearance on behalf of Defendants Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al., be granted. An appropriate Order is attached.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

/s/

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Brian Steinbach  
Bar No. 24849  
1227 25th Street, N.W.  
Suite 700  
Washington, D.C. 20037  
(202) 861-1870

DATED: January 11, 2006

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the above Motion to Withdraw Appearance on Behalf of Defendants was served this 11<sup>th</sup> day of January, 2005, by the means indicated below, on the following:

**By Electronic Service:**

John R. Harney  
O'Donoghue & O'Donoghue  
4748 Wisconsin Avenue, N.W.  
Washington, D.C. 20016

Attorneys for Plaintiffs

**By U.S. Mail, First Class Postage Prepaid:**

Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al..  
c/o Stuart B. Ratner, Esq.  
Stuart B. Ratner, P.C.  
111 Prospect Street  
Stamford, CT 06901

Defendants

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/s/  
Brian Steinbach